

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) Civil Case No. _____
)
\$8,720.00 U.S. CURRENCY,)
)
 Defendant.)

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

COMES NOW the United States of America, (the "United States" or the "Government"), by and through Bobby L. Christine, United States Attorney for the Southern District of Georgia, and Xavier A. Cunningham, Assistant United States Attorney, and brings this Verified Complaint for Civil Forfeiture *In Rem*, with the following allegations:

NATURE OF THE ACTION

1. *In Rem* civil forfeiture is permissible under Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.

2. The Defendant Property is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6), because it constitutes (1) money, negotiable instruments, securities and other things of value furnished and intended to be furnished in exchange for a controlled substance in violation of the Controlled Substances Act; (2) proceeds traceable to such an exchange; and/or (3) money, negotiable instruments, and

securities used and intended to be used to facilitate a violation of the Controlled Substances Act.

THE DEFENDANT *IN REM*

3. The Defendant Property consist of \$8,720.00 in United States Currency (hereinafter, the "Defendant Currency"), which was seized during the execution of a federal search warrant at 755 Evergreen Road, Dublin, Georgia 31021. The Defendant Currency has been converted into a cashier's check and made payable to the United States Marshals Service. The Defendant Currency is currently in the custody of the United States Marshals Service.

JURISDICTION AND VENUE

4. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a). This Court has *In Rem* jurisdiction over the Defendant Currency under 28 U.S.C. § 1355(b).

5. Venue is proper pursuant to 28 U.S.C. § 1395 as the Defendant Currency was seized in this District, and because the Defendant Currency is currently located in this District.

FACTS

6. A federal search and seizure warrant was issued on June 20, 2019, for 755 Evergreen Road, Dublin, Georgia 31021 as a part of an on-going criminal investigation of Quaveris Mims, and other individuals believed to be members of a

Drug Trafficking Organization (DTO). 755 Evergreen Road, Dublin, Georgia 31021 was identified as Mr. Mims's residence.

7. On June 21, 2019, at approximately 3:00 p.m., members of the United States Drug Enforcement Administration's Macon Resident Office (MRO), along with members of the Ocmulgee Drug Task Force (ODTF), Laurens County Sheriff's Office (LCSO), Twiggs County Sheriff's Office, and the Washington County Sheriff's Office (WSCO), organized to execute a federal search and seizure warrant at 755 Evergreen Road, Dublin, Georgia.

8. During the search MRO Special Agent Justin B. Jacobs ("SA Jacobs") located the Defendant Currency is a safe in the master bedroom closet. The Defendant Currency was packaged in two zip locked bags and a clear plastic container, along with Rashida Mims's checkbook for an account with Robins Financial Credit Union, 2 gold chains, 1 gold ring, various Georgia vehicle titles with ownership ascribed to Quaveris Mims, a jewelry and gemstone appraisal report, Mr. Mims's U.S. Passport, a white pill marked "N P 14" which is suspected to be 20mg of Oxycodone, and 4 unknown blue pills.

9. During the search of the home and the shed in the backyard of the property, the officers located multiple firearms, including, a loaded silver Taurus PT100AFS, bearing serial number SZC-94656, a KelTec Black PLR-16, bearing serial number P9885, as well as a digital scale, hollowed out speakers, which is a known method for artfully concealing illegal narcotics, and white powder that was field tested and confirmed as cocaine.

CLAIM FOR RELIEF

WHEREFORE, the United States of America prays that process of a Warrant for Arrest and Notice *In Rem* be issued for the arrest of the Defendant Currency; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the Defendants Currency be forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other relief as this Court may deem just and proper.

This 25th day of November, 2019.

Respectfully submitted,

BOBBY L. CHRISTINE
UNITED STATES ATTORNEY

/s/ Xavier A. Cunningham

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Assistant United States Attorney
New York Bar Number 5269477


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VERIFICATION OF COMPLAINT FOR FORFEITURE *IN REM*

I, Special Agent Tyler W. Vanderberg with the Drug Enforcement Administration, have read the foregoing Complaint for Forfeiture *in Rem* in this action and state that its contents are true and correct to the best of my knowledge and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

This _____ day of November, 2019.



TYLER W. VANDERBERG
SPECIAL AGENT
DRUG ENFORCEMENT ADMINISTRATION